

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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IN RE:

CHAPTER 13

Pablo Clarke

Case No: 11-42730-JF

Adversary Pro. No. 11-01299-jf

Debtors.

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Pablo Clarke

COMPLAINT

Adv. No. 11-01299-jf

Plaintiffs,

Case Assigned to:
Hon. Jerome Feller

-against-

Nationstar Mortgage LLC

Defendant.

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NOTICE OF HEARING ON MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE, that on July 7, 2011 at 10:00 AM, the undersigned will move before the Honorable Jerome Feller, United States Bankruptcy Court, 271 Cadman Plaza East, Courtroom 3554, Brooklyn, New York, 11201, or as soon thereafter as counsel may be heard for an order (a) pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, for entry of a default judgment against Defendant Nationstar Mortgage LLC pursuant to 11 U.S.C. Section 506(a) declaring that the claim held by Defendant, secured by a mortgage lien on the Plaintiff's real property, be deemed unsecured and pursuant to 11 U.S.C. Section 506(d) declaring that said lien is null and void; and (b) such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, must be served upon the undersigned at least seven (7) days prior to the return date of this motion and must be filed with the bankruptcy court not later than one (1) day following the date of service.

Dated: New York, NY
June 9, 2011

Law Offices of Gus Michael Farinella PC
Attorneys for the Debtor
Pablo Clarke

By: /s/ Gus Michael Farinella
Gus Michael Farinella, Esq.
15 Park Avenue
Suite One South
New York, NY 10016
(212) 675-6161